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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 ANDREW OKUSKO, individually and on behalf
12 of all others similarly situated,

13 Plaintiff,

14 v.

15 DYNAMIC LEDGER SOLUTIONS, INC., THE
16 TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

17 Defendants.
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Case No. 3:17-cv-06829-RS

CLASS ACTION

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR EXPEDITED
DISCOVERY**

Date: February 29, 2018
Time: 1:30 p.m.
Judge: Hon. Richard Seeborg
Crtrm.: 3, 17th Floor

1 This matter comes before the Court on the motion of Plaintiff Andrew Okusko (“Plaintiff”) for
2 an Order pursuant to Federal Rule of Civil Procedure 26(d)(1) permitting Plaintiff expedited discovery
3 before the parties’ Rule 26(f) conference.

4 Having reviewed the materials submitted and being fully advised, the Court GRANTS
5 Plaintiff’s motion as follows:

6 1. Plaintiff may serve immediately the document requests as detailed in Exhibit 1, attached
7 to the Declaration of Donald J. Enright to this Motion, on Defendants Dynamic Ledger Solutions, Inc.
8 and the Tezos Foundation;

9 2. Defendants Dynamic Ledger Solutions, Inc. and the Tezos Foundation shall produce
10 documents responsive to Plaintiff’s document requests by _____, 2018; and

11 3. Defendants Dynamic Ledger Solutions, Inc. and the Tezos Foundation shall produce for
12 deposition one officer, director, or managing agent, or other persons who consent to testify on their
13 behalf about information known or reasonably available to each organization regarding the matters
14 identified in Exhibit 1, attached to the Declaration of Donald J. Enright to this Motion, on Defendants
15 Dynamic Ledger Solutions, Inc. and the Tezos Foundation by _____, 2018.

16 SO ORDERED.

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18 Dated: _____

The Hon. Richard Seeborg
United States District Court Judge